

**Green, LindaE**

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**From:** Gaines, Cynthia  
**Sent:** Thursday, June 25, 2015 6:54 PM  
**To:** FOIA HQ  
**Subject:** FOIA Request from Anne Novak  
**Attachments:** 15-001-0507.pdf

Please see the attached request. Thanks.

Cynthia A. Gaines  
Correspondence Specialist  
Office of the Executive Secretariat  
202-564-1788

Tue Jun 23 08:36:23 EDT 2015  
Leavy.Jacqueline@epamail.epa.gov  
FW: Request for copy of Petition to de-list PZP as a pesticide for wild horses and burros, etc.  
To: CMS.OEX@epamail.epa.gov

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**From:** anne@protectmustangs.org [mailto:anne@protectmustangs.org]  
**Sent:** Tuesday, June 23, 2015 6:45 AM  
**To:** Mccarthy, Gina  
**Subject:** Request for copy of Petition to de-list PZP as a pesticide for wild horses and burros, etc.

Ms. Gina McCarthy

EPA Administrator

USEPA Headquarters  
William Jefferson Clinton  
Building 1200  
Pennsylvania Avenue, N.  
W. **Mail Code:** 1101A  
Washington, DC 20460  
[McCarthy.gina@Epa.gov](mailto:McCarthy.gina@Epa.gov)

202-564-4700

June 23, 2015

Dear Ms. McCarthy,

In May 2012 we contacted the EPA to request you de-list wild horses as "pests". (see email below). The EPA refused.

Now we understand that Friends of Animals has filed a petition against using Porcine Zona Pellucida (PZP) on wild horses and burros. Please email us a copy of the petition without delay.

We also request a copy of all materials relating to PZP as well as relating to the Pesticide Fact Sheet for PZP: [http://www.epa.gov/pesticides/chem\\_search/reg\\_actions/pending/fs\\_PC-176603\\_01-Jan-12.pdf](http://www.epa.gov/pesticides/chem_search/reg_actions/pending/fs_PC-176603_01-Jan-12.pdf) Why are unpublished studies by J. Grandy used as part of the data base supporting registration?

There has been some confusion around PZP being called a pesticide. Is it a pesticide? Is it birth control?

Thank you for your kind assistance.

Sincerely,

Anne Novak

Anne Novak

Executive Director

[Protect Mustangs](#)

Tel./Text: 415.531.8454

[Anne@ProtectMustangs.org](mailto:Anne@ProtectMustangs.org)

Read about native wild horses: [http://protectmustangs.org/?page\\_id=562](http://protectmustangs.org/?page_id=562)

Twitter: <https://twitter.com/TheAnneNovak>

Facebook: <https://www.facebook.com/ProtectMustangs>

In the news: <https://newsle.com/AnneNovak>

[www.ProtectMustangs.org](http://www.ProtectMustangs.org)

Protect Mustangs is an organization who protects and preserves native and wild horses.

----- Original Message -----  
Subject: Request to repair EPA error classifying the iconic American wild horse as 'pests'  
From: <[anne@protectmustangs.org](mailto:anne@protectmustangs.org)>  
Date: Fri, May 11, 2012 10:44 am  
To: [heggem.daniel@epa.gov](mailto:heggem.daniel@epa.gov)

Daniel T. Heggem

Acting Division Director

Environmental Protection Agency

[heggem.daniel@epa.gov](mailto:heggem.daniel@epa.gov)

Dear Mr. Heggem,

We respectfully request that the EPA apologize for classifying America's legendary wild horses as 'pests', acknowledge the classification error and cancel approval of ZonaStat-H and any other pesticides for indigenous wild horses or American burros.

America's wild horses and burros are an asset to the environment and humankind. Science proves they create biodiversity and heal the land—reversing damage and desertification.

The American public is uplifted knowing wild horses are roaming freely in the West. People come from around the world to catch a glimpse of wild horses because they are beloved icons of the American spirit and freedom.

Public land grazing allotment holders might call free roaming wild horses a nuisance but they have an obvious conflict of interest because they want all the grazing and water rights for their livestock, etc. They would like to eliminate the rights of the free roaming wild horses and burros. We hope the EPA will not buy into their game.

There is no scientific proof wild horses are overpopulating—only inflated estimates by the Bureau of Land Management (BLM) who must invent high numbers so Congress will give them millions of taxpayer dollars to fund their broken Wild Horse and Burro Program.

Indigenous wild horses do not reproduce like rabbits—many die before the age of two. Life on the range can be hard and most wild horses do not reach the age of 17. As a wildlife species, this is normal. Left alone they will self-regulate as an integral piece of the ecosystem.

Wild horses have natural predators such as mountain lions, bears and coyotes to name a few. BLM goes to great lengths to downplay the existence of predators to foster their overpopulation estimate-based myths.

We expect the EPA to be based on science not myth.

Are you aware of the [two Princeton studies](#) proving equids heal the land for cattle to thrive?

The first study, "Facilitation Between Bovids and Equids on an African Savanna," was published in Evolutionary Ecology Research in August 2011, and supported

by grants from the National Science Foundation, the Keller Family Trust and Wageningen University, the Netherlands.

The second study, "African Wild Ungulates Compete With or Facilitate Cattle Depending on Season," was published in Science on Sept. 23, 2011, and supported by grants from the National Geographic Society, the National Science Foundation, the U.S. Fish and Wildlife Service, and the International Foundation for Science.

Besides the environmental hazards of using ZonaStat-H, we are concerned the iconic herds will risk ovary damage and permanent sterilization from multiple use or overdosing with PZP.

We ask that all ZonaStat-H use be put on hold immediately until your “pest” classification error has been corrected and for the EPA pesticide/drug approval be retracted.

Please reply to us via email or fax immediately with your response.  
Thank you.

Sincerely,

Anne Novak

Executive Director for Protect Mustangs

encl:

EPA Pesticide Fact Sheet for ZonaStat-H [http://www.epa.gov/pesticides/chem\\_search/reg\\_actions/pending/fs\\_PC-176603\\_01-Jan-12.pdf](http://www.epa.gov/pesticides/chem_search/reg_actions/pending/fs_PC-176603_01-Jan-12.pdf)

Wildlife and cows can be partners, not enemies, in search for food <http://www.princeton.edu/main/news/archive/S32/93/41K10/index.xml?section=featured>

NB: Faxed to numerous senators and representatives

Anne Novak

Executive Director

Protect Mustangs

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415.531.8454

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*Protect Mustangs is a Bay Area-based preservation group whose mission is to educate the public about the American wild horse, protect and research wild horses on the range and help those who have lost their freedom.*